

Mr. Bill Dommermuth
Chemrex
P. O. Box 27
Centerville, Indiana 47330

Re: Significant Permit Revision 177-12237-00062
Revision to CP177-9318-00062, and
Rescission of MSOP 177-10717-00062

Dear Mr. Dommermuth:

Chemrex, 519 West Water Street, Centerville, Indiana, was issued permits CP177-9318-00062 and MSOP 177-10717-00062 on April 28, 1998 and August 12, 1999 respectively, for a commercial waterproofing material production plant. A letter requesting revisions to these permits was received on April 28, 2000. The permit revision is as follows (changes are bolded and deletions are struck-through for emphasis):

Source's Requests 1:

The Thoroclear 777, which was permitted in CP177-9318, issued on April 24 1998 is no longer in production and been removed from the source. The issued permit should be amended to reflect this change.

OAM Response 1:

Item (e) of Section A.2 and of Section D.2 in the project description table of CP177-9318 was deleted in the permit.

Since this equipment is no longer in operation, it was deleted from CP177-9318 and all operational conditions applicable to it were deleted. See below changes.

D.2.1 BACT Minor Limitation [326 IAC 8-1-6]

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- (a) ~~The input VOC to the Thoroclear 777 mixer shall be limited to 705 tons 12 month period, rolled on a monthly basis. This is equivalent to a VOC potential to emit of 24 tons per year using a flashoff factor of 3.4%. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.~~
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- (b) ~~During the first 12 months of operation, the input raw material usage to the Thoroclear 777 mixer shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.~~

- (ea) The potential VOC emissions are less than 25 tons per year for the individual facilities within the following mixing and packaging operations:
- (i) water based acrylics, and
 - (ii) urethanes and epoxies.
- Prior to any change which may increase the potential VOC emissions of any individual facility within these operations, approval from the Office of Air Management (OAM) will be required.

D.2.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.3 the Permittee shall maintain records ~~in accordance with (1) through (6) below~~ of the following ~~Records maintained for (1) through (6) and~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
- (1) The amount of VOC content of the ~~Thoroclear 777 coating material and solvent used:~~ **acrylics, urethane and epoxies, used in each respective production line.** Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) ~~A log of the dates of use;~~
 - ~~(3) The volume weighted VOC content of the Thoroclear 777 used for each calendar day;~~
 - ~~(4) The cleanup solvent usage for each month;~~
 - ~~(5) The total VOC usage for each calendar day and month; and~~
 - ~~(6) The weight of VOC emitted for each compliance period.~~
- (b) To document compliance with Condition D.2.2 and D.2.5 the Permittee shall maintain records of daily visible emission notations of the dry operations facilities stack exhausts.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The Reporting Requirements and the Reporting Form for the Thoroclear 777 coating operation on Page 21 of 23 were deleted from the permit.

~~D.2.7 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

Source's Requests 2:

The Hydrozo Products Mixer, which was permitted in MSOP177-10717-00062, issued on August 12, 1998 has been removed from service. The issued permit should be amended to reflect this change.

OAM Response 2:

Since the Hydrozo Product Mixer was removed from service, MSOP177-10717-00062 where it was permitted was rescinded.

The source is not subject to the Part 70 Permit Program. Pursuant to 326 IAC 2-6.1-3, the source that has a valid air operating permit shall apply for approval under this rule no later than 90 days prior to the expiration date of that permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this revision with the original permit.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

APD

cc: File -Wayne County
Wayne County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Jerri Curless
Permit Tracking - Janet Mobley
Air Programs Section -Michele Boner

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for Significant Permit Revision

Source Background and Description

Source Name: Chemrex
 Source Location: 519 West Water Street, Centerville, Indiana 47330
 County: Wayne
 Significant Permit Revision: 177-12237-00062
 SIC Code: 2851
 Permit Reviewer: Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from Chemrex, Centerville Plant relating to the request to remove equipment/operation permitted under CP177-9318-00062, and equipment/operation permitted under MSOP 177-10717-00062.

The source was permitted under the name "Harris Specialty Chemicals". The proposed permit revision application is under the source's new name "Chemrex".

The source's requests for a permit revision is as follows (changes are bolded and deletions are struck-through for emphasis):

Source's Requests 1:

The Thoroclear 777, which was permitted in CP177-9318, issued on April 24 1998 is no longer in production and been removed from the source. The issued permit should be amended to reflect this change.

OAM Response 1:

Item (e) of Section A.2 and of Section D.2 in the project description table of CP177-9318 was deleted in the permit.

Since this equipment is no longer in operation, it was deleted from CP177-9318 and all operational conditions applicable to it were deleted. See below changes.

D.2.1 BACT Minor Limitation [326 IAC 8-1-6]

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- (a) ~~The input VOC to the Thoroclear 777 mixer shall be limited to 705 tons 12 month period, rolled on a monthly basis. This is equivalent to a VOC potential to emit of 24 tons per year using a flashoff factor of 3.4%. Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply.~~
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- (b) ~~During the first 12 months of operation, the input raw material usage to the Thoroclear 777 mixer shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.~~

- (e a) The potential VOC emissions are less than 25 tons per year for the individual facilities within the following mixing and packaging operations:
- (i) water based acrylics, and
 - (ii) urethanes and epoxies.
- Prior to any change which may increase the potential VOC emissions of any individual facility within these operations, approval from the Office of Air Management (OAM) will be required.

D.2.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.3 the Permittee shall maintain records ~~in accordance with (1) through (6) below~~ of the following ~~Records maintained for (1) through (6) and~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.

- (1) The amount of VOC content of the ~~Thoroclear 777 coating material and solvent used:~~ **acrylics, urethane and epoxies, used in each respective production line.** Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) ~~A log of the dates of use;~~

- (3) ~~The volume weighted VOC content of the Thoroclear 777 used for each calendar day;~~

- (4) ~~The cleanup solvent usage for each month;~~

- (5) ~~The total VOC usage for each calendar day and month; and~~

- (6) ~~The weight of VOC emitted for each compliance period.~~

- (b) To document compliance with Condition D.2.2 and D.2.5 the Permittee shall maintain records of daily visible emission notations of the dry operations facilities stack exhausts.
- (c) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

The Reporting Requirements and the Reporting Form for the Thoroclear 777 coating operation on Page 21 of 23 were deleted from the permit.

D.2.7 Reporting Requirements

~~A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

Source's Requests 2:

The Hydrozo Products Mixer, which was permitted in MSOP177-10717-00062, issued on August 12, 1998 has been removed from service. The issued permit should be amended to reflect this change.

OAM Response 2:

Since the Hydrozo Product Mixer was removed from service, MSOP177-10717-00062 where it was permitted was voided in its entirety.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on April 28, 2000.

Emissions Calculations

The removal of these equipment will not result in an increase in emissions, but rather will reduce the sourcewide emissions.

Justification of the Approval Level

The source has a construction permit CP177-9318-00062, issued on April 24, 1998. A mistitled Minor Source Operating permit (MSOP) 177-10717-00062, was also issued to the source on August 12, 1999. The source having a valid operating permit shall apply for approval under the new Article 2 Rules no later than 90 days prior to the expiration date of CP177-9318-00062.

The proposed changes will be a significant permit revision to permit CP177-9318-00062, since it is a relaxation of operation conditions, and voiding of permit MSOP 177-10717-00062.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

The source has been determined in CP177-9318-00062 that it is not subject to Part 70 permit program, even prior to the removal of these two (2) production lines as proposed in this permit revision.

This determination is still the same because the potential to emit (PTE) of:

- (a) at least one of the criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, or
- (c) any combination of HAPs is less than 25 tons/year.

Pursuant to 326 IAC 2-6.1-3, the source that has a valid air operating permit shall apply for approval under this rule no later than 90 days prior to the expiration date of that permit.

Federal Rule Applicability

- (a) New Source Performance Standards:
There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable from the removal of Thoroclear 777 and Hydrozo product mixer.
- (b) National Emission Standards for hazardous Air Pollutants:
There are no National Emission Standards for hazardous Air Pollutants(326 IAC 12) and 40 CFR Part 63 applicable from the removal of Thoroclear 777 and Hydrozo product mixer.

State Rule Applicability

There are no state rules applicable to the removal of Thoroclear 777 and Hydrozo product mixer.

Conclusion

The commercial waterproofing material production plant will be subject to the conditions of the attached proposed **Significant Permit Revision177-9318-00062**.